

1 P. STERLING KERR, ESQ.
Nevada Bar No. 003978
2 PETER R. PRATT, ESQ.
Nevada Bar No. 6458
3 LAW OFFICES OF P. STERLING KERR
2450 St. Rose Parkway, Suite 120
4 Henderson, Nevada 89074
Telephone No. (702) 451-2055
5 Facsimile No. (702) 451-2077
Email: peter@sterlingkerrlaw.com
6 *Attorneys for Plaintiff*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 BASF CORPORATION,
10

11 Plaintiffs,

12 vs.

13 AUTOMALL AUTO BODY, LLC d/b/a FIX
14 AUTO HENDERSON, KTI LLC d/b/a
15 AMERICAN AUTO BODY, FIX NORTH LLC
16 d/b/a FIX AUTO LAS VEGAS NORTH, FIX
NORTH LLC d/b/a FIX AUTO-CRAIG ROAD,
AND JEFFERSON BAGLEY,

17 Defendants.

Case No. 2:20-cv-01080 RFB-NJK

18 **STIPULATION AND ORDER TO EXTEND DEADLINE FOR DEFENDANTS TO**
19 **ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

20
21 Defendants Automall Auto Body, LLC, KTI LLC, and Fix North LLC (together "Fix
22 Auto") and Jefferson Bagley ("Bagley") (collectively "Defendants") by the undersigned counsel
23 and with the consent of Plaintiffs BASF Corporation ("BASF"), hereby respectfully submit this
24 stipulation for an extension of time for Defendants to file their answer or other response to
25 Plaintiff's Complaint by fourteen (14) days, making the new deadline Wednesday, August 12,
26 2020.

27 ///
28

1 1. The current deadline for Defendants to file their answer or other response is
2 believed to be Wednesday, July 29, 2020.

3 2. Lead counsel for Defendants, Michael C. Whitticar (“Mr. Whitticar”), only
4 recently has been retained by Defendants.

5 3. Mr. Whitticar needed time to interview and retain local counsel.

6 4. This stipulation is made in good faith and not for the purposes of undue delay.
7
8 The deadline to file Defendants’ answer or other response has not been previously extended, and
9 the requested extension will allow the Defendants’ counsel sufficient time to better evaluate the
10 complaint and to file a more robust answer or other response.

11 WHEREFORE, Defendants, with the consent of Plaintiff, hereby stipulate to extend
12 Defendants’ deadline to file their answer or other response to Plaintiff’s Complaint through and
13 including August 12, 2020.
14

15 IT IS SO ORDERED :

16 
17 United States Magistrate Judge

18 DATED: July 30, 2020 ____

19 Respectfully Submitted This 29th Day of July, 2020:
20

21 By: /s/ Michael C. Whitticar
22 Counsel

23 Michael C. Whitticar (VSB No. 32968)
24 NOVA IP Law, PLLC
25 7420 Heritage Village Plaza, Suite 101
26 Gainesville, VA 20155
27 Tel: 571-386-2980
28 Fax: 855-295-0740
 E-mail: mikew@novaiplaw.com
 Counsel for Defendants
 Pro Hac Vice Planned